

**MOSKOWITZ COLSON  
GINSBERG SCHULMAN**

Moskowitz Colson  
Ginsberg & Schulman LLP  
80 Broad Street, Suite 1900  
New York, NY 10004  
(212) 257-6455  
www.mcgsllp.com

**MEMORANDUM ENDORSED**

June 27, 2024

Honorable Gregory Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/27/2024

Re: *United States v. Nerik Ilyayev*, 23 Cr. 506 (GHW)

Dear Judge Woods:


Mr. Ilyayev was sentenced on April 18, 2024, to 48 months of imprisonment for his participation in a healthcare fraud conspiracy. He is scheduled to surrender to the BOP on July 15, 2024. I write to respectfully request an extension of Mr. Ilyayev's surrender date until October 21, 2024. Pursuant to a stipulation and order signed on the day of sentencing, Mr. Ilyayev has agreed to sell three properties designated as substitute assets and to remit the net proceeds from the sales to the government by October 18, 2024. He put all three properties on the market weeks ago and has been working diligently to locate potential buyers. At this point, however, he does not expect to complete the sales until shortly before the October 18 deadline. He has a buyer for one of the properties but has not received market-rate offers on the other two. Moreover, once he sells the properties, he will need to move his family out of their primary residence and into a new apartment. Mr. Ilyayev's wife is not able to assist her husband as she gave birth to their fourth child on June 5, 2024, and is consumed with childcare. I have conferred with the government, and it has no objection to an extension of Mr. Ilyayev's surrender date.

Thank you for your consideration.

Application granted. The date by which Mr. Ilyayev must surrender is extended to October 21, 2024.

The Clerk of Court is directed to terminate the pending motion at Dkt. No. 91.

SO ORDERED.

  
GREGORY H. WOODS  
United States District Judge

Dated: June 27, 2024  
New York, New York

Respectfully submitted,

/s/

Deborah Colson  
*Attorney for Mr. Ilyayev*

cc: Government Counsel